

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
Southern Division

FILED
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RECEIVED

William Whittman
7805 Edmunds Way
Elkridge, MD 21075
202-391-5582
samigioka@yahoo.com

Plaintiff

V

PPE CASINO RESORTS MARYLAND, LLC
d/b/a Live Casino & Hotel
Formerly Maryland Live! Casino
SUITE 7777
7002 ARUNDEL MILLS CIRCLE
HANOVER MD 21076

THE CORDISH COMPANIES, INC.
SUITE 600
601 E PRATT ST
BALTIMORE MD 21202-3114

Defendants

JUN 22 REC'D

AT M^{rs} GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DEPOSIT BOX

Case No. 22-CV-1547 ADC

Jury Trial Requested

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22 JUN 22 PM 4:02

COMPLAINT

Plaintiff, William Whittman "*pro-se*" brings this Action for Relief, under *Title II of the Civil Rights Act of 1964* and under *Title 42, Chapter 21 of the U.S. Code*, stating as follows:

1. This is a *Discrimination Case* based on *National Origin*.
2. This Court has jurisdiction over this matter based on the Federal question, and
3. Venue is proper because the location of this place of accommodations "*Live Casino & Hotel*" falls under the geographical location of this Court.
4. Defendants, in this *place of accommodation*" have engaged in a systematic and routine unlawful act, denying plaintiff what is made available, to other client-guests, giving rise to these causes of action

5. Pursuant to 42 USC CHAPTER 21, SUBCHAPTER II: (PUBLIC ACCOMMODATIONS), §2000(a) (Equal Access): “All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations”.

6. These systematic and routine discriminatory of these defendants gave rise to 1) *Discrimination Causes of Action (Federal Question)* as well as to the Maryland-Recognized-Tort Claims of: 2) Bad Faith, *Unfair Business Practices (CPA 2017)*, 3), *Malicious Prosecution*, 4) *Retaliation* and 5) *Slander embarrassing, humiliating, intimidating and threatening plaintiff in the eyes of others, through Public Humiliation* for nothing plaintiff has done to deserve this.

7. These acts that form a pattern of business practices, conduct and behaviors, have deprived plaintiff of the rights that are secured by 42 USC CHAPTER 21, §2000a-2, (a) and §2000a -2, (b).

8. The violation of this " CHAPTER (42 USC CHAPTER 21) provides for relief for plaintiff and punishments for the wrongdoers, as stated in the text from the chapter, incorporated below.

"...No person shall (a) withhold, deny, or attempt to withhold or deny, or deprive or attempt to deprive any person of any right or privilege secured by section 2000a or 2000a-1 of this title, or (b) intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person with the purpose of interfering with any right or privilege secured by section 2000a or 2000a-1 of this title, or (c) punish or attempt to punish any person for exercising or attempting to exercise any right or privilege secured by section 2000a or 2000a-1 of this title..."

9. This Action is initiated within the *statute of limitation*, including a range of discriminatory acts that begun as far as Summer of 2018, with the last discriminatory act, giving rise to these causes of action, occurred on Tuesday, July 20, 2021.

10. Plaintiff has warned the defendants since the very first unlawful actions of these defendants against plaintiff, not to destroy electronically stored information, that will prove indisputably all the alleged claims

11. Defendants have admitted on May 13, 2022, replying to plaintiff's attempt to resolve these matters with them outside the court, that these defendants have all the recordings pertaining to all the alleged acts, with the Executive, Vice President of Live Casino and Hotel, Howard G. Weinstein, stating in writing that they have reviewed each and every and found that based on their evidence they have done nothing wrong, and

12. The videos they have reviewed prove that plaintiff was the one who engaged in unlawful acts of destroying and breaking their machines for example, having casted them \$1364.42 to fix and or replace that machine

13. It is exactly this same evidence, that they cannot even think now at this point to destroy having admitted they have these electronically stored information that plaintiff will use to prove the opposite of what they claim, for each of the despicable acts of these defendants, including the fact that this exact machine was malfunctioning for days and that no button panel was broke or cracked or fixed or replaced due to some plaintiff's conduct.

14. Plaintiff seeks:

- 1) *1.2 million in Actual Damages*, or in the alternative whatever dollar amount the jury finds right and just
- 2) *350,000.00. Punitive Damages* for each of the discriminatory count and for each unlawful acts and claims, like the malicious prosecution with the intent to discriminate or the alternative whatever dollar amount the jury finds right and just and

- 3) *Legal Fees & Cost*, pursuant to *42 USC CHAPTER 21 §1988 (b)*.
- 4) *Jury Trial* and
- 5) *the Service of the Attorney General*, pursuant to §2000a–5 (a).

JURISDICTION AND VENUE

Jurisdiction

15. **Subject Matter Jurisdiction.** The Federal District Courts have original jurisdiction of all civil actions arising under the laws of the United States. (28 U.S. Code § 1331).

Venue

16. **Venue** is proper in this Hon Court pursuant to 28 U.S.C. § 1391(b)(1) and 28 U.S.C. § 1391(b)(2), because all happened here, in the “Live Casino & Hotel” located within the territorial jurisdiction of this Hon Court.

PARTIES

17. **William Whittman**, (Aka Sami Gjoka) is natural persons, (US Citizens) and his current address is:

7805 Edmunds Way
Elkridge, MD 21075
samigjoka@yahoo.com
202-391-5582
samigjoka@yahoo.com

18. **PPE CASINO RESORTS MARYLAND, LLC.**, d/b/a *Live Casino & Hotel* and Formerly known as Maryland Live! Casino CMC is a Maryland Based entity (*Department ID*

Number: W12880514) with its Principal Office Address at: 601 E PRATT STREET, 6TH FLOOR. BALTIMORE MD 21202 and its resident agent to serve process is:

CSC-LAWYERS INCORPORATING SERVICE
COMPANY
7 ST. PAUL STREET
SUITE 820
BALTIMORE MD 21202

19. **THE CORDISH COMPANIES, INC.** (D12355152) and/or The Cordish Companies, (T00274165) is and/or are Maryland Based Entity with its (their) Principal Office Address at:

THE CORDISH COMPANIES
601 EAST PRATT STREET
SUITE 600
BALTIMORE MD 21202

THE LEGAL BASIS

20. This is a *Discrimination Case* based on *National Origin*, brought to this Federal Forum as a *FEDERAL QUESTION*.

21. Pursuant to 42 USC CHAPTER 21, SUBCHAPTER II: (PUBLIC ACCOMMODATIONS), §2000(a) (*Equal Access*): “All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations”.

22. Plaintiff seeks actual and punitive damages in the amount that a jury of his peers will fight right and just and

23. Plaintiff intends to acquire Service of the Attorney General, in accordance with According to §2000a–5 (a) with Plaintiff, properly and timely and in accordance with §2000a–5, applying to engage the Service of the Attorney General.

24. According to §2000a–5 (a) Complaint;

"Whenever the Attorney General has reasonable cause to believe that any person or group of persons is engaged in a pattern or practice of resistance to the full enjoyment of any of the rights secured by this subchapter, and that the pattern or practice is of such a nature and is intended to deny the full exercise of the rights herein described, the Attorney General may bring a civil action in the appropriate district court of the United States by filing with it a complaint (1) signed by him (or in his absence the Acting Attorney General), (2) setting forth facts pertaining to such pattern or practice, and (3) requesting such preventive relief, including an application for a permanent or temporary injunction, restraining order or other order against the person or persons responsible for such pattern or practice, as he deems necessary to insure the full enjoyment of the rights herein described.

25. In Accordance with §2000a–5 (b)

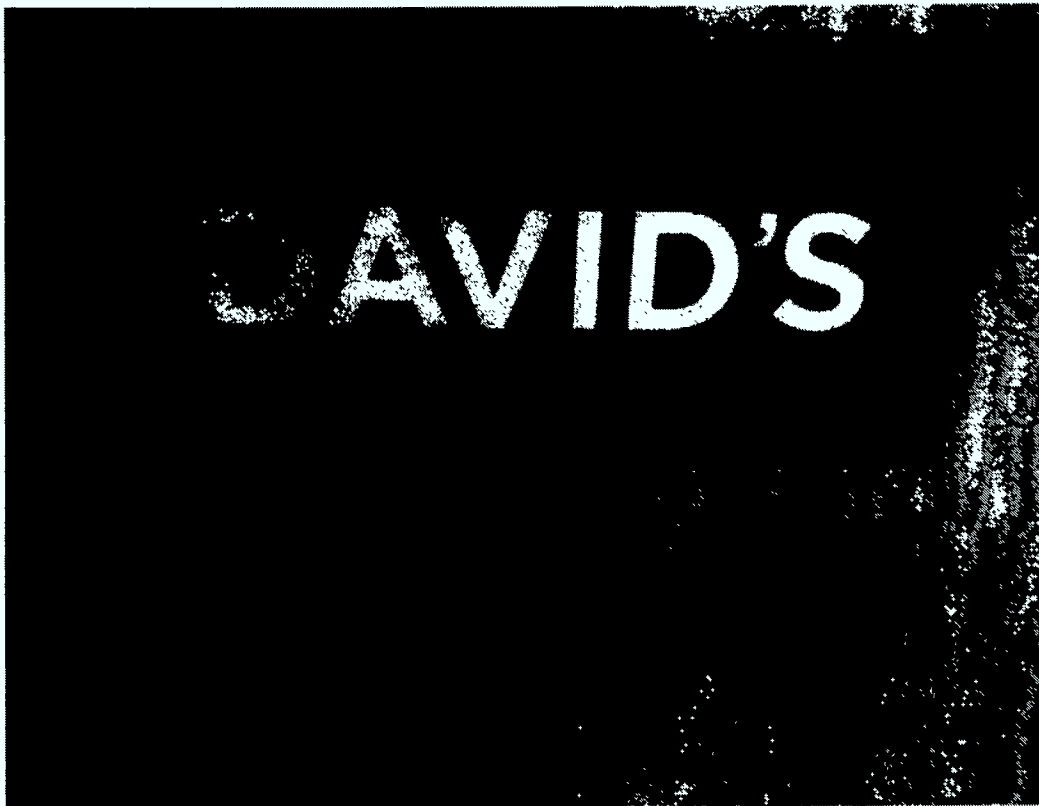
"The Attorney General may file with the clerk of this court a request that a court of three judges be convened to hear and determine the case. Such request by the Attorney General shall be accompanied by a certificate that, in his opinion, the case is of general public importance. A copy of the certificate and request for a three-judge court shall be immediately furnished by such clerk to the chief judge of the circuit (or in his absence, the presiding circuit judge of the circuit) in which the case is pending. Upon receipt of the copy of such request it shall be the duty of the chief judge of the circuit or the presiding circuit judge, as the case may be, to designate immediately three judges in such circuit, of whom at least one shall be a circuit judge and another of whom shall be a district judge of the court in which the proceeding was instituted, to hear and determine such case, and it shall be the duty of the judges so designated to assign the case for hearing at the earliest practicable date, to participate in the hearing and determination thereof, and to cause the case to be in every way expedited. An appeal from the final judgment of such court will lie to the Supreme Court.

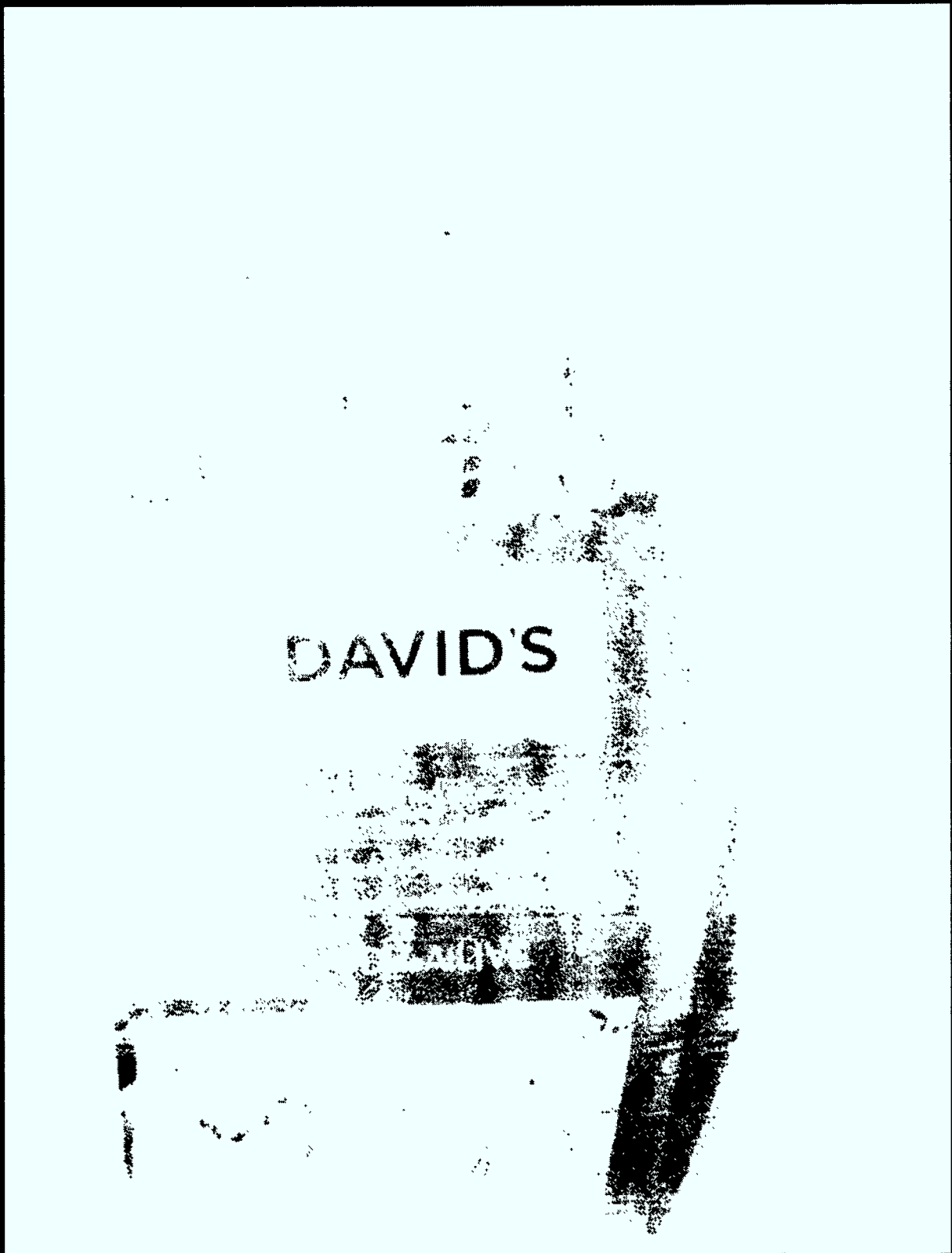
26. Furthermore, in case the Attorney General takes this case, the attorney's fees demanded in this complaint, shall be paid, by these defendants, to the office of the attorney general in the amount that a private representation normally would have charged for these representations.

27. As to the liability of THE CORDISH COMPANIES, INC., this issue has already been resolved in *Stocks v. Cordish Companies, Inc.*, Civil Action No. 2014-1999(D.D.C. 2015).

28. Cordish (the defendant) tried to persuade the court to dismiss Cordish, as defendants, arguing that Cordish be dismissed because Cordish does not own or operate this casino with the court finding that Cordish has admitted and given notice to the world, through its consistent advertising and had given notice to the world that Cordish indeed owns and operates this casino and

29. Cordish continues even more now to admit and give notice to the world that Cordish indeed owns and operates this casino "Live Casino & Hotel", as seen in some of the incorporations bellow.





DAVID'S
PRIVATE SELECTION
Series

Remy Martin Dinner
A 5-course dinner featuring Remy Martin
cognac and a selection of gourmet dishes.

First Course:
Remy Martin
Cognac

Second Course:
Remy Martin
Cognac

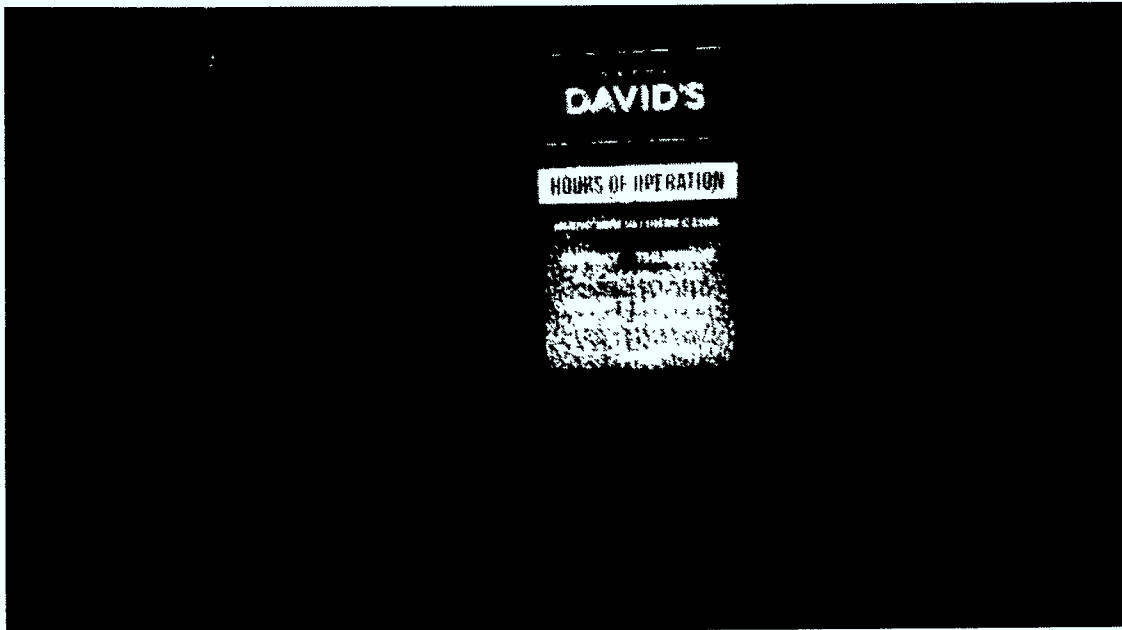
Third Course:
Remy Martin
Cognac

Fourth Course:
Remy Martin
Cognac

Fifth Course:
Remy Martin
Cognac

THURSDAY, OCTOBER 17 7:00PM

BOOK NOW ON TICKETFLY OR INQUIRE WITH DAVID'S HOST DESK.

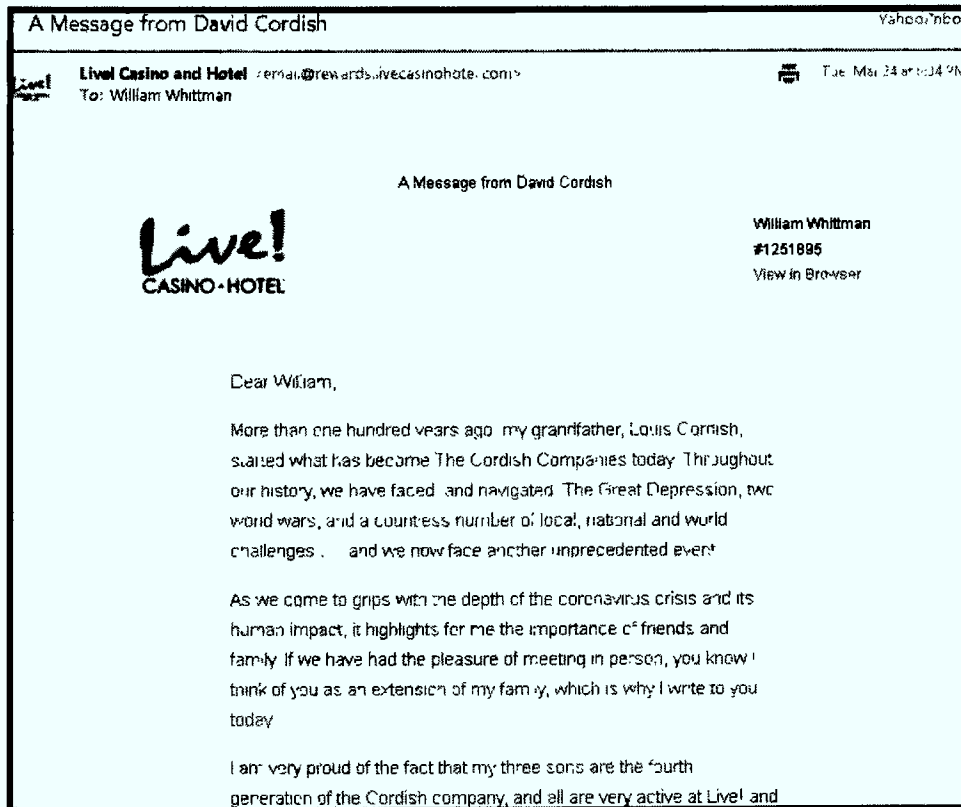


October 16, 2019

William,

Thank you for visiting Live! Casino & Hotel this past Tuesday. I am
always honored when you choose to spend your time as part of my Live!
family. Everyone here looks forward to your next visit. Wishing you the
best of luck!

Good luck!
David Cordish



I am very proud of the fact that my three sons are the fourth generation of the Cordish company, and all are very active at Live! and in fact, many of you have met them. And now, for the piece of resistance, we are within a year or so of adding a grandson that will be the fifth generation. Put another way, we are born and bred Marylanders and we are not going anywhere. We hope to continue with you as our family for many more decades.

I've received many calls and emails, and while I appreciate your questions and concerns, I don't want you to worry about your status at Live! during these trying times. The shutdown of our operations will not impact your tier status, comps, points, and offers. When we resume normal operations, all those items will be honored. If you have a slot ticket to redeem, we will honor that too. Operationally, at a minimum, we will extend the expiration date of those items to cover the period we were shutdown, plus significantly more. We will be waiting for you when our doors reopen, now is a time for you to remain healthy and safe.

In this issue of enormous scale, I ask you the same as I do of my three sons, be with your loved ones and adhere to government and healthcare advisories. Please keep our employees and their families in your thoughts as we keep you in ours. Until then, look forward to going Live! with you again soon.

All the Best,

David A. Cordish

CONFIDENTIAL - INTERNAL

Live! is an economic engine that will create maximum community benefits for the City of Richmond, including:

- A robust community engagement plan with **\$200 million** in upfront/ongoing payments to the City to help fund critical needs;
- Generate over **\$7.5 billion** in economic stimulus to the City in its first 15 years, more than any other project;
- **8,000 total new jobs**, including 5,000 estimated during construction and 3,000 new permanent jobs for local and regional residents; and
- Average wages of **\$60,000** including benefits and no less than \$15 an hour for hourly team members, **65.5% over** the region's minimum wage.

Stay up to date by visiting our [website](#) or joining our [Facebook](#) or [Instagram](#) social channels. The [Richmond Economic Development Authority](#) has a website that includes more information about the process.

PENDING FINAL APPROVAL FROM THE CITY OF RICHMOND

I appreciate your help and look forward to welcoming Live! to Richmond!

Respectfully Yours,



David Cordish

STAMENT OF FACTS

30. Plaintiff has organized the *Statement of Facts* into five groups:
- I. Facts evidencing that the rights and privileges offered to all were denied to plaintiff based on plaintiff's Ancestry Origin.
 - II. Facts evidencing equal access and enjoyment if this place of accommodation based on plaintiff's Ancestry Origin.
 - III. Facts evidencing exploitation of plaintiff, for the benefit and interest of their American born guests
 - IV. Facts evidencing False Arrest & Malicious Prosecution against plaintiff for the benefit and the interest of the American Born Guests.
 - V. Facts evidencing Retaliation against plaintiff as reaction to Plaintiff's warning of a Legal Actions.

I.

Facts evidencing that the rights and privileges offered to all were denied to plaintiff based on plaintiff's Ancestry Origin.

Count 1

31. Around January- February of 2017, plaintiff used to play "*Progressive Sun Moon*" slot machines located next to Cheesecake Factory, in this casino; "*Live Casino and Hotel*".

32. One night, while playing in one of the "*Progressive Sun Moon*" machines, plaintiff witnessed a Latino couple that he had become acquainted with (*Ana and Salvador*) playing in one of the slot machines that have a progressive amount of \$500.00.

33. Salvador came to plaintiff and asked plaintiff if plaintiff wanted to take over their machine because they had inserted a lot of money on it but they were running out of money and the progressive amount was flashing, indicating it was getting close to hit, with the progressive amount almost at \$500.00.

34. Plaintiff was glad and seized this opportunity and started to play their machine with them next to him.

35. After playing their machine for half an hour, with no luck, plaintiff decided to go back to his *Sun Moon Machine* where he had invested a good amount of money, as well, planning to come back to “*Ana’s & Salvador’s Machine*” if he hit the *progressive jackpot* in his machine, or lend Ana and Salvador some money for them to play their machine.

36. Plaintiff had a *black card membership* and the casino provided a privilege to *black card members* to hold a machine they were playing for up to four hours.

37. Plaintiff called a slot attendant and asked her to block the machine for him.

38. Once the slot attendant disabled the machine, plaintiff returned to his *Sun Moon Machine* and started to play it.

39. As soon as plaintiff started to play his *Sun Moon Machine* the attendant came back to plaintiff and told plaintiff that if he cannot play another machine while they had another machine blocked for him.

40. The attendant told plaintiff to stop playing the Sun Moon Machine or she would open the other machine for the other players.

41. Plaintiff had seen many black card members block a machine they were playing for a while and play another machine, with no questions asked, and this differential treatment, made hurt and deeply disturbed him.

42. The attendant, opened the machine he had reserved.

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Count 2

43. A few months later, (around Spring of 2017) plaintiff started to play another type of slot machines called *Progressive Triple Seven Blazing*. (See pictures below).



44. Playing these new machines plaintiff got acquainted and became friend with another regular player, J. Lee.

45. Both Plaintiffs and J. Lee held their respective player's membership card.

46. Both plaintiff and J. Lee are and look, and sound foreign born and their English is far from perfect.

47. Plaintiff is a US citizen of Albanian origin and Lee is a US citizen of Korean origin.

48. At some point, Plaintiff and J. Lee reached a decision to play the same machine, if one of them had lost a lot of money in one machine, in hopes to get back some money they had lost and minimize the risk of uncertainties.

49. These *Triple Seven Blazing* machines usually hit the jackpot before reaching the \$1200.00 progressive amount.

50. The reason why plaintiff and J. Lee used to play these machines, is because defendants advertise these machines as *98% pay back machines*.



51. These *Seven Blazing* machines pay out if bars or the three sevens line up in the center line.

52. There are 2 kinds of Sevens in these machines; blazing sevens and plain sevens.

53. If 3 blazing sevens line up, the progressive jackpot is paid.

54. If three plain red Sevens line up, with the maximum bet, the machine pays \$300.00

55. If a mixed of sevens line up the payout amount is 200 dollars.

55.. Regardless if the jackpot hits or does not hit, these machines are advertised by to pay out 98% of the money invested on them.

57. These *Blazing Seven Slot Machines* are located next to the cashier booths in the center of this casino.

58. These Machines were previously located at the main entrance facing the entrance to the mall.

59. Plaintiffs and Lee had seen each other, many a time, lose all their money and seen each other go to the ATM Machines for more money and when the ATM would not give more money, go to the cashiers' booth, that permits withdraws, for a very high fee, in desperate hopes of getting back some of the 98% of the money lost.

60. When the friendship and the level of trust grew between the two of them, plaintiff and Lee started to borrow money from each other, when limits were reached to withdraw from cashiers and or to save the very high fee they paid, using the casino's cashiers.

61. Furthermore, whenever Lee or Plaintiff lost a lot of money in one of these machines and the machine had not paid anything yet, believing, in good faith, based on the defendants' representation, that that machine should be ready to pay, and wanting not to let someone else, get the money they had spent, each would call or text the other or ask the other if both were present to take over that machine, in hopes that it was time to pay.

62. Plaintiff and Lee, often played the same machine to minimize their loses and increase the chance to get back some of the 98% they had lost and:

63. Sometime around April of 2018, playing *these blazing sevens* plaintiffs run quick out of money and was waiting for Lee who owed him \$800.00 dollars to arrive.

64. Using the privilege of the black card membership plaintiff called a slot attendant to place a cup on his machine.

65. After the attendant disabled the machine, plaintiff set next to his friend, an American born black lady (Sylvia) waiting for Lee, to come.

66. The attendant came back to plaintiff and told plaintiff that he had to leave the casino floor or she would put his disabled machines back in service.

67. The attendant told plaintiff you can only block the machine when you go to eat or go to get more money.

68. Sylvia, said to plaintiff: *"They shouldn't tell you this, they never tell this to us (meaning to those who do not look or sound foreign born) and you play and spent here tons of money every night for them to treat you like this"*.

69. The attendant told plaintiff he had to leave if he wanted to keep the machine out of service.

70. Plaintiff, felt hurt and unhappy and was immensely disturbed by such unprovoked and undeserved humiliating mistreatment and was forced to get up and leave, in order not to have his blocked machine given to others, something American born players never had to go through in this place of accommodation.

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Count 3

71. On the first weekend of June 2018 plaintiff was plying one of these *Triple Seven Blazing* machines and was losing his money, as usual.

72. There were other people, playing next to him (*the two machines in his right*) and they (*the two other players*) were losing in a faster speed.

73. They had lost more money than plaintiff and plaintiff was thinking to get those two machines for him and for J. Lee if they decided to leave, without getting back some of the money they had spent.

74. When those 2 other players left an *American Born Black Lady* jumped in and got both the machines.

75. This appearing American-Born-Black-Lady, however only played these machines for a few spins each and then she called one of the slot attendants to block them.

76. This American Born Black Lady, most likely had been watching the players lose a lot of money and assuming that these machines had to pay back 98% of what the 2 players had lost, decided to grab them and reserve them for herself or her friends.

77. The slot attendant came and with no question asked, disabled both machines.

78. Once the black lady who looked and sounded American born left, plaintiff called the attendant and told her that: *"We appreciate you giving us the opportunity to block the machines we play, but that woman had no right to put a stop on those two machines because she has not played those machines but only inserted a couple of dollars to give the impression she had been playing those machines, while she had not and, abusing the privilege of black card membership and this is not good for the casino in a weekend, when everyone is waiting for a machine"*.

79. The attendant told plaintiff that if a player has a black card and is sitting on a machine, the player has the right to block the machine with no questions asked even if she only has had only one spin.

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Count 4

80. The very next weekend, on Sunday June 10, 2018 plaintiff arrived at this Casino around 10:30 AM and found Lee, playing the same *Blazing 777 Machines*.

81. Lee had been playing all night long.

82. Lee was sad and exhausted and angry and desperate and still inserting hundred-dollar bills, as if 20-dollar bills, hoping, like always, to get back some of the 98% of the money she had spent, back.

83. Lee was playing machine NO: 13-18-02.

84. Lee told Plaintiff that she had had lost a lot of money on that machine, and that she had been playing all night long.

85. Lee had borrowed 500 dollars from plaintiff a few days earlier and she had not paid it yet to plaintiff.

86. Lee and plaintiff decided to play that machine together from that moment on to increase chance to win and reduce the risk of losing more, in hopes of getting some of the 98% of the spent money.

87. The agreement they had when they played the same machine together was that they start from the moment they decide to play together invest equal amount and split equally any whatever the machine would pay them.

88. Lee was now physically sitting in the machine and playing, with their combined money.

89. There are only 5 such machines in that section and there was a black *American-Born-Guest* by the name of Maurice who was playing all the other machines, at that moment.

90. Maurice was and letting others play, going round and round, with one spin per machine, leaving money in every machine for the next spin round and round.

91. While these defendants, have not allowed plaintiff and Lee to hold two machines far apart, since you cannot play them at the same time, these defendants appeared to have no problem allowing this American born player (Maurice) hold all the machines at once that in no way, shape or form, could he play at once, being so far apart from each other.

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Count 5

92. *This Appearing-American-Born player (Maurice)* was allowed by these defendants to occupy all the machines on a busy *weekend-day* while plaintiff and J. Lee as same as the other players who looked Indian or Spanish, like Lee and plaintiff, were not permitted, by these defendants to hold two machines apart, even in a slower week day.

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Count 6

93. These *Seven Blazing Machines* are very close to the security desk, on the right of the cashier booths and very close to the *casino employee entrance* to the left of the cashiers' booth, and none of the casino employees seemed to be bothered that an *American born player* could hold all the machines, while others were waiting to play, but did not allow foreign born players to hold even 2 machines apart, even in a slow day for the casino.

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Count 7

94. Lee and Plaintiff played Lee's machine till around 2PM, that day, Sunday June 10, 2018 unable to get the money they spend and they were now only playing to hit the progressive jackpot and stop it haven already given up the idea that the machine would pay back anything close to what they had spent.

95. They decided to take a break and plaintiff called a slot attendant that was nearby and asked her to turn their machine off for a couple of hours.

96. That slot attendant was a white American lady named Kim.

97. Maurice, the young black American gentleman that was playing all other four machines, going round and round said as if taking to himself to plaintiff: *"No you can't stop it because you were not playing"*.

98. Maurice, this young black young American born gentleman said something to the attendant (*attendant Kim*) in a lower voice.

99. The attendant left the machines directly after Maurice whispered something in her ear, while Lee and plaintiff were waiting for her to come and disable their machine.

100. Waiting for Kim or any other attendant to return, plaintiff started to play while Lee was waiting behind plaintiff for the slot attendant to come back.

101. Kim came back and asked plaintiff to give her his player's card.

102. Plaintiff took the card from the slot machine and handed it to Kim.

103. Kim said she wanted to take his card and go and check if he had been playing enough the machine, something that had never happened before with other American born players, who ask to exercise this privilege offered to all but denied to people who appear to be foreign born.

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Count 8

104. Plaintiff was very hurt and deeply disturbed that despite the fact that only a week earlier, these defendants had told plaintiff that if a player has a black card and demands to put stop in a machine, they would comply with that request with no question asked, even if he had only had even one single spin but this was not the case for plaintiff and Lee, who looked and sounded foreign ng born in this Casino,

105. This humiliating and degrading and despicable act of these defendants to command plaintiff and Lee to surrender the playing membership cards to them for them to verify, whatever they purported to verify to deny plaintiff and Lee his rights and privileges not denied to American born clients gusts of this casino made plaintiff very unhappy and plaintiff still told her firmly and respectfully that is not up to her to decide or to verify how much he and

Lee had played, as long as they were playing, when they made the request to hold (reserve) this machine.

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Count 9

106. Plaintiff told KIM that he himself had complaint to them only a week ago not to let people block machines for 2-3 dollars inserted to use their privilege as black card members and that

107. Defendants themselves had stated that it is their policy to comply with players' request place a cup on the machine anytime a black card member asks for this, as long as player is playing that machine when he asks for this service.

108. The attendant left again and again came back accompanied by a young black employee whose name was Rhonda and who said in a very aggressive and harassing attitude, for Plaintiff and Lee having asked to what was their right and privilege.

109 Kim and Rhonda continued with their harassing and degrading and humiliating acts against Lee and Plaintiff as if Lee and Plaintiff had done something horribly wrong, to make such a scene with every one looking at plaintiff and Lee, for asking these defendants with a very respectful manner to provide to them what they provided to all but denied to players appearing or sounding as foreign born.

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Count 10

110. Rhonda who said is the floor manager said to plaintiff that they checked out his membership card and he had not played enough to qualify for this service that was provided to American born players with no need for them to check how much they had spent and that was irrelevant, as to their own admission.

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Count 11

111. Plaintiff told Rhonda and Kim that checking how much he has spent, was not the correct thing to do and that this was not decent and polite and dignifying because he and Ms. Lee had played that machine for so long, and Lee had her card inserted most of the time and that this is irrelevant anyhow because since they had a policy that *the black-card-members* can request to disabled the machine they are playing at any time, irrespective how much they have played, checking his card spending history is stupid, with plaintiff meaning to say stupid to discriminate

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Count 12

112. Manager Rhonda, escalate the situation, purposefully intentionally and deviously distorting plaintiff's turning to plaintiff and saying to plaintiff: *"Don't you call me stupid"* that was a despicable act to threat and intimidate plaintiff from their position of superiority with these defendants having their security on the scene and the police of Arundel County walking, often though the casino floor, arms in arms with them as in a police state, to intimidate and threaten players not to dare questions improprieties of this heinous and despicable individuals and entities, who everyone plaintiff talks about, believe this is the result of bribing the state, with supposedly donations they make to have their protection and use the Anne Arundel, to support them even buy their presence as unpaid added security in this place, to intimidate people abused by these individuals, like Plaintiff and Lee.

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Count 13

113. Once Rhonda said to plaintiff *"Don't you call me stupid"* fully aware that plaintiff did not call her that she left in a hurry together with Kim, with an implied attitude, see what we

will do you F.. ing FOB (*fresh from the boat*) to leave one thing and one thing option available to plaintiff and Lee, leave the floor or face their rage and anger and prosecution for daring to ask for equal opportunities in this place of accommodations.

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Count 14

114. Seconds later Rhonda and Kim and another manager, Mr. Cooper and 2 security officers following them rushed like an army of intimidating and threatening thugs toward Plaintiff and Lee, that these heinous and despicable entities and individuals have to produce though comers they have since plaintiff has warned them that day not to destroy the evidence, which they would not have dared destroy pursuant to the Fed Laws of Electronically stored information, for they will seek justice in a court of law for their heinous and unlawful despicable, retaliatory and discriminatory actions that day coming toward Lee and Plaintiff as if they were some criminals in a place they did not belong, simply for asking what was their right and privilege, offered to all but denied to those these cowards perceived as non-American born.

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Count 15

115. Neither plaintiff nor Lee deserved this humiliating, degrading threatening and intimidating treatment and neither plaintiff nor Lee had done anything to deserve this despicable thuggish treatment, simply because there were tons of American born guests waiting to play that day, who to these cowards are the only ne entitled to the privileges offered to all in this place of accommodations.

116. Neither Lee nor Plaintiff threatened, cursed or demanded anything, and camera surveillance records will prove this in front of the jury, and plaintiff has asked the defendants not dare destroy this electronically stored information, pursuant to *Federal Rule 34*.

117. Neither Plaintiff nor Lee threatened have even raised their voices to anyone stuff or player in this casino that day or any day for these despicable entities and individuals to come like threats, threaten and intimidate harass and humiliate plaintiff and Lee for daring to ask they provide to them what they provide with no question asked to American born members of this casino.

118. Neither Plaintiff nor Lee showed any rudeness or attitude because they were denied, what this place of accommodation offered supposedly to everyone with a black or higher membership card but honored these rights and privileges only for the players looking or sounding American Born

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Count 16

119. Plaintiff was terrified to see Mr. Cooper following Kim and Rhonda and the security guards with them all walking toward Lee and Plaintiff in a very aggressive and threatening manner, as if they were in a place they did not belong, though there was no one in that crowd, who spend more money for this despicable place than Plaintiff and Lee. every single day and night for many years with some times each spending close to 10K a night.

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Count 17

120. Plaintiff had seen a year or so earlier, this gentleman, Mr. Cooper with a security guard, escort a Latino man out of the casino floor, with the man asking them why they were kicking him out.

121. Plaintiff had heard Mr. Cooper tell the man, "Because *you are drunk*".

122. The Latino guy turned and asked plaintiff, who was walking opposite their direction: "*Do I look drunk to you?*".

123. The Latino guy did not look drunk at all to plaintiff, and plaintiff had seen drunk young white guys, acting crazy, almost every Friday and Superday night in this casino floor bothered by no one as long as they did not look foreign born.

124. Plaintiff had told the Latino guy: *"You don't look drunk to me but if they don't want you here be happy to go and save your money"*.

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Count 18

125. Plaintiff had a bitter image of this place and especially of this Mr. Cooper, since that moment, of being very unfair and discriminatory to their Spanish looking client-guests and;

126. Seeing this same gentleman. (Mr. Cooper) come straight to him and Lee with other managers and with 2 security guards, plaintiff became very nervous and fearful of what they would try to instigate or say or do to provoke him and Lee reacts to find an excuse under false pretenses to kick them out or even arrest them, under their false and heinous pretenses, because they dared to ask these defendants to provide the same privileges, they provided with no question asked to everyone but denied to those looking and/or sounding foreign born.

127. Plaintiff asked Lee for this reason to start recording whatever was about to happened.

128. Mr. Cooper, introduced himself as the floor manager, and addressed Lee by her first name, they had already checked the cards and new their names.

129. Mr. Cooper said to plaintiff and Lee that they cannot place a cup on the machine because they had not played enough, which was a lie and irrelevant fact.

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Count 19

130. Plaintiff explained to Mr. Cooper again what had just happened and what these defendants had said to him only a few days earlier, when the black lady had blocked two of these machines, machines that she had not played at all, except hit a few spins to block those machines, and repeated word per word these defendants prior statements that as long as a black care member is playing in machine, irrespective of how much or how long she has played she has the privilege to block the machine and they will provide that privilege with no question asked.

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Count 20

131. Mr. Cooper arrogantly, arbitrarily and with the cowardness of being from a position of superiority to threatened harass and intimidate repeated to plaintiff: *"You have not played enough, sir for this privilege in this machine "* while plaintiff was still playing but not with his card because his card was in their hands because they had to go and check how much he had played in this machine with his card, something they never did with American born clients.

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Count 21

132. Plaintiff then asked Mr. Cooper: *"Can you then tell us how much is enough so we play some more to reach that amount before asking you to hold it for us?"*

. 133. Mr. Cooper repeated; *"You have not spent enough"*.

134. Plaintiff asked again Mr. Cooper, how much was enough.

135. Cooper and Rhonda and Kim and the security Guards were now staring at plaintiff, as if surprised why was plaintiff still playing as if they expected plaintiff and Lee to get up and leave.

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Count 22

136. Plaintiff sensed things were about to spin out of control for nothing they had done and but for daring to ask that these defendants do not deny to him and Lee what was not denied to American born guest of this casino and to prevent anything drastic and oblivious to occur, plaintiff told Mr. Cooper that Lee was recording all of this.

137. Once plaintiff pointed out to them that Lee was recording this act, they as coward as all thugs and criminals are changed their attitude in the spot, trying to appear civilized and calm with Cooper stating to plaintiff that in Maryland it is illegal to record anyone without their permission and consent.

138. Plaintiff said to Cooper that they had the right to do so, if they feel threatened and, in this place, and that they were being threatened and intimidated by them, and that they did not need permission, in this place since they recorded every movement of every single player in the casino floor already and:

139. Plaintiff warned them to better not destroy their recording because he is going to need this, to be presented in a court of law, as a prove of what they did to him, for nothing he had done except ask that they provide him with his right and privileges, offered to all but denied, at all cos to those looking foreign born and;

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Count 23

140. Plaintiff demanded again from them to know how much more did they need to spend for them to be able to qualify for the benefits and privileges that the American born qualified, with no set of time and amount spend, as long as they are actively playing the machine when they make the request.

141. Cooper with the same degrading, harassing and intimidating tone of voice repeated: *"I can't tell you that, it is up to our judgment"* and they left.

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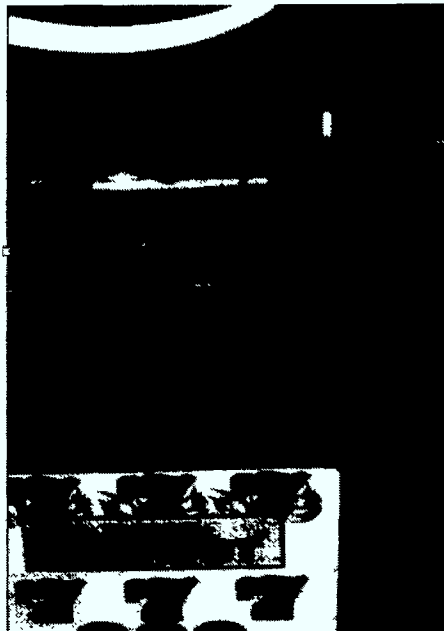
Count 24

142. Only 2 weeks later, on Saturday June 23, at around 2 AM on weekend with people wanting to play these slot machines, an American sounding and looking black lady was playing machine No: 13-`8-04 and she decided to block the machine she was playing and called the attendant.

143. The attendant disabled the machine with no question asked.

144. No one took her membership card to go and check behind the casino floor walls how much she had spent or how long she had played.

145. No floor managers and no security guard were called to come and threatened and intimidate her for asking for these privileges, with one and one expiation alone she being American born while plaintiff and Lee are not.



II.

Facts evidencing denial of equal access and enjoyment of this place of accommodation to plaintiff, based on plaintiff's Ancestry Origin.

Count 25

146. Plaintiff and J. Lee were two looking and sounding foreign born regular guests in this casino who always played the *Blazing Sevens*.

147. Others who played these machines daily night were American looking and sounding born guests including amongst others Cindy and Valery, and Lisa and Angie and Isaac and Anita, and Silvia and Dianne, and Almira and Randy and Keith.

148. While all the other players experienced good bad nights, in these machines, Plaintiff and J. Lee were the only ones who lost every night, as same as they were the only one foreign born, that was almost impossible to occur by luck and chance.

149. Even the American born players had hard time to believe that plaintiff and Lee were losing due to their bad luck in this casino.

150. It was for this reason that one day, on July 2018, Cindy, Valery, Lisa and Angie who had all developed some kind of friendship, seeing every machine turn cold on plaintiff the moment plaintiff set to play them, as if a ghost kept changing the *payout rate*, based on who plays what, in this casino, suggested to plaintiff not to use his membership card, any more since they did not let him win.

151. They were there to make money for themselves and not to worry if others win or lose and chances for them to win are greater when others loose, yet, even they (all of them) had start to believe that the casino was not letting Plaintiff and J. Lee win and Plaintiff and J. Lee were both foreign born slowly starting to believe that this casino was exploiting the foreign born, drain them to please here and there the American born players in this place of accommodation.

152. They had seen Plaintiff and J. Lee, who played, as same as them, these *Blazing Sevens* almost every night, loose, sometime 6-7 thousand dollars a night and go home broke, almost every night, while

153. They as all other American born players in this casino had a lot of good nights, as well, as nights of terrible loss and nights of breaking even, but not like Plaintiff and Lee who lost every night and even if they hit once here and there a jackpot, it was almost nothing to how much they had put in, and

154. They had seen Plaintiff and Lee spend every night 6-7 thousand dollars.

155. Cindy and Valery, and Lisa and Angie and Isaac and Anita, and Silvia and Dianne, and Almira and Randy and Keith, all American born (black and white), had witnessed time after time that while the American born gamblers could last in these machines for hours and sometime all night with only 6-700.00 dollars, they had brought with them to play, Plaintiff and Lee lost almost that amount night after night, as soon as they set in to play, with machines turning cold to them as soon as they set in to play, and as if the machines were programed to monitor the players based on the inserted card or face recognition, and that appeared away too much of abuse and exploitation of the foreign born players for the interest and the benefit of the American born.

156. Cindy, a white American born player, seeing plaintiff loose, like every night, in every machine, while the American born kept loosing and wining as always, as all do in casino< could not help one night, but ask plaintiff if plaintiff thought it was racist.

157. Plaintiff was sure in himself that he and his friend J. Lee were exploited, in this casino to benefit exactly them, (his American born player-friends), but plaintiff was now more concern for the fact that:

158. Since plaintiff had informed them that he was going sue them, for denying him the same rights and privileges offered to all, he had seen and sensed they were trying to get plaintiff in trouble to either force him stop coming here or create a pretext to kick him out before plaintiff sues them.

159. Plaintiff was sure in himself they wanted to ban him before the lawsuit, as a prerequisite for them to claim, as a ground of defense that plaintiff was suing them because he was banned from the casino and not for any discriminatory acts of theirs.

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Count 26

160. When Cindy asked plaintiff if plaintiff thought his treatment in this casino racist plaintiff told Cindy and others next to them: "*I don't know but it is becoming clear to me that they are trying to find an excuse to kick me out before e I sue them*".

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Count 27

161. One weekend Sylvia had lost all her money and asked plaintiff to come play her machine with her last few dollars she still had for plaintiff to be able to place a cup in that machine, using his black card, so Sylvia could go get some more money and come back, because she had already blocked earlier a machine and any of the American born guest could only reserve one machine per day with no question asked.

162. Plaintiff told Sylvia that with what they had done to him and Jenney Lee the other day, taking his card to check how much he had played and bringing two security guards and a bunch of people to bully, intimidate and harass plaintiff and Lee not to dare ask for privileges offered, with no question asked to American born guest, plaintiff would never dare ask them again even to reserve a machine for himself.

163. Sylvia was very unhappy and she made it clear to plaintiff that she believed plaintiff simply did not want to help her, implying he would rather wait for her to leave and play her machine himself.

164. Plaintiff reiterate to Sylvia that he can't because they monitor his every move in this "shit whole", but he can't stop coming because he has lost tons of money here believing in good faith that these machines "Triple Blazing Sevens" will one day pay him some of 98% of what I have lost.

165. Sylvia, fund plaintiff's statement crazy and she said laughing to plaintiff; *"Are you telling me that someone behind those walls is keeping an eye on you?"*

166. Plaintiff said to Sylvia *"Yes, it is exactly what I am saying Sylvia"*.

167. *"Please"*, Sylvia told plaintiff; *"don't give me this bullshit no body care if you are here or not let alone monitoring you. They make too much money, screwing all of us, not to care if you even exist"*.

168. *"You want me to prove it to you"*; plaintiff told Sylvia.

169. *"Yes"*, Sylvia said to plaintiff *"prove it to me"*.

170. *"Well,"* plaintiff told Sylvia, *"Look how many people are here, and let me sit for only a few seconds in a squatting position, here in front of you if they will not come and tell me as if I am kindergarten child to get up"*

171. They laughed at plaintiff, thinking plaintiff was crazy and Sylvia said: *"Ok. Let's see it"*.

172. Plaintiff placed his hand in the slot machine next to where Sylvia was sitting and set in front of Sylvia in a squatting position between the *Blazing Sevens and Triple Double Gold Machines.*:

173. In seconds a casino employee came out of the doors next to the cashier booths, and started to walk straight to plaintiff and Sylvia, as if someone had been pinpointing the cameras at plaintiff. monitoring plaintiff's every single move to find a pretext to harass and intimidate plaintiff to react to kick him out of that place, under false pretenses.

174. Plaintiff told Sylvia: *"Look, there they come Sylvia"*

175. *"You are crazy"* said Sylvia to plaintiff laughing while at that moment the casino floor manager, stopped in front of plaintiff and Sylvia and told plaintiff to stand up.

176. Plaintiff got up with Sylvia shocked stating to plaintiff:

177. *"You kidding me. This is really f..ked up. I would have never believed that".*

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Count 28

178. On Friday July 20, 2018, plaintiff arrived to the casino around 11:45 PM. and all the 777 *blazing* machines were taken.

179. Lee was playing in one of these machines; machine No: 13-18-04.

180. While plaintiff was waiting for one of these *blazing machines* to open, plaintiff set in one of the quarter machines, machine No. 13-14-06 that used to be next to the blazing sevens and started to play it, just not to get bored.

181. Plaintiff was waiting to play Lee's machine if Lee did not win anything.

182. The progressive amount in one of these blazing machines, machine No; 13-18-03 had passed \$1,290.00.

183. Isaac, a black American born gentleman who is married to another of plaintiff's friend, Anita, had occupied that machine and had been playing it for many hours.

184. Plaintiff and Lee were thinking to play that machine and try their luck with the jackpot if Anita or Isaac did not hit it but Isaac and Anita eventually hit it.

185. Lee kept playing the same machine (13-18-04.) that she had been playing all night long.

186. In the Morning, Saturday, July 21 around 2-3 AM, Maurice, the black young gentleman who rushes to occupy any machine, he sees open and who will steal your machine from you, in a blink of an eye, even if you get just to stretch your legs, if there is no money in the machine, gave plaintiff no chance to get any of the machines, taking them and keeping them, for himself spinning each machine once and round and round.

187. The only machine Maurice was not playing was machine 13-18-04 that Lee was still playing.

188. That early morning, Saturday, July 21 Maurice was accompanied by his female friend, Daniele, who was guarding his machines for him while he went round and round, or went to cash the tickets.

189. Sometime Daniele would go to cash Maurice's tickets while Maurice stayed playing.

190. Maurice lost most of his money and gave up for a while machine number 13-18-05, next to Lee's machine.

191. Lee started to play that machine, without giving up hers.

192. Maurice, as Marcie does with every machine, the moment Lee was not paying attention jumped in Lee's machine inserted his money and started to play it.

193. Lee was angry with plaintiff for not staying alert and prevent Maurice from stealing her second machine.

194. Lee told Marcie she had not finished with it and that plaintiff was to ply it because they play together.

195. Marcie ignored Lee and kept playing round and round. all the machines except the one Lee was playing.

196. Lee told plaintiff then not to worry about this because Marcie most likely will give up quick, on that machine for them to take it back, but as soon as Maurice, started to play Lee's machine, the machine turned, as if touched by a magic wand, from completely cold to a very hot machine, giving Marcie the red sevens every 2-3 minutes and it also hit the jackpot, on top of all this making Plaintiff and Lee very unhappy.

197. Lee left the area very angry and upset seeing this same systematic pattern in this casino, using, abusing and exploiting Plaintiff and her for the benefit and interest of their American born guests.

198. Plaintiff sat at the Triple Double Gold machines, waiting for Maurice to free any of the machines.

199. While plaintiff was sitting, waiting for a machine the security guard came to plaintiff and asked plaintiff what was he doing sitting there.

200. Plaintiff was completely lost what he meant, because this had never happened to him before and he had never seen anyone from casino security or not ask any one in the casino floor, whey they were there, or what were they doing in this place.

201. The casino was no longer packed because the majority of the crowed had already gone but still there were people in the casino

202. Plaintiff thought first the security guard knew him from any prior encounter and was kind of jacking with him.

203. Plaintiff looked at the officer, unsure what to say or what the officer meant.

204. The security officer asked plaintiff, as if police asking you if you are drunk, if plaintiff had been playing, that night.

205. Still in shock and uncertain why he was asking these questions, plaintiff responded to the security guard that yes he had been playing and that he was waiting for one of the *Blazing Seven Machines*, that Maurice was occupying, to open, so he plays the machines he had come to play and that he was not yet having a chance to play.

206. The security officer looked, as if he was not hearing any word plaintiff was saying as he was hearing something someone else was telling him in his earbud.

207. Plaintiff asked the security guard: *WHY was he asking plaintiff those questions*".

208. The security guard said: *"Because I was told to come to check what you are doing here"*.

209. Plaintiff was surprised even more that someone above him, in this casino, had ordered him and was directing him to ask plaintiff what he was doing in the casino

210. Plaintiff reassured himself he was hearing him correctly by asking the officer: *"They told you to come and check on me?"*

211. The security guard told plaintiff did not answer plaintiff but ordered plaintiff to get out.

212. The officer added he cannot stay there and look at others play

213. Plaintiff told the security guard the casino was full of people who were not playing for a moment, and he never had seen anyone tell anyone else that the moment you are not playing you should get out.

214. The security guard was staring at plaintiff as if he should forcefully remove plaintiff from there and waiting for plaintiff to start walking outside.

215. Plaintiff did not move and asked the security guard again: "*They told you to single me out, and kick me out of here because I am not playing for a second?*"

216. The officer said to plaintiff: "*You are overshadowing people*"

217. Plaintiff did not know what overshadowing meant but he assumed to mean you are standing behind summons's shoulders, that was a lie and even if it was a true, the casino was filled with people watching others play every time and non-had ever been bothered by for this unless, for them to have any other than retaliating against plaintiff because they knew plaintiff was suing theme for their discriminatory acts against him.

218. While the officer was getting impatient that plaintiff was not getting out of the casino, plaintiff asked again; "*You are kicking me out because I am not plying now while so many, are doing exactly what you are accusing me, in front of your eyes?*"

219. The officer told him he is doing what he is told and he is doing his job and ordered plaintiff to get out.

220. Plaintiff asked for his name and the security guard said his name is Malcolm.

221. Humiliated and threatened, bullied, Plaintiff left to never step foot in this racist place ever.

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Count 29

222. Walking out that night, Saturday, July 2018 at around 3-4 Am (*chased by these defendants out* as if he was a stray dog or as if he had committed an act of criminal conduct, all he could see were people standing behind other people, watching others play everywhere, and this disturbed and troubled him immensely, for the fact that those looked all American born.

223. Plaintiff felt this was not right, and if he ever was going to complaint, he was sure these despicable defendants would flatly deny this ever happened and not even a single judge, in

the entire nation would believe this sort of things can ever happened in an American place of accommodations, like this casino.

. 224. Plaintiff decided for this reason to go to the car take his Cellphone and come back and take pictures of everyone watching others play with not the slightest sign of disturbance and harassment from these defendants, simply because they were all looking American born guests.

. 225. Plaintiff returned back with his cell to take pictures of every one he could see on the floor, standing behind people playing and watching them play, bothered by no one from this casino but plaintiff's phone was dead and he went back to the car to charge the phone.

226. Once the phone was charged enough for him to take a few pictures, plaintiff came back to the casino.

227. When plaintiff returned, Maurice was still playing and Daniele was still looking over his shoulder.

228. Maurice said to plaintiff, as soon as plaintiff came back, that the security guy came and asked him and Daniele what you (for plaintiff) were doing, and looked like they (defendants) wanted to get some excuse to kick you out of the casino.

229. Maurice told plaintiff, that the security guard had asked Daniel, if he (plaintiff) had been playing and Daniel jumped and said "I told him (for the officer) that he (plaintiff) has been playing, but he (the officer) forced you non the less to get out>

230. Maurice and Daniel asked plaintiff how did they let him in again and that wasn't him afraid they might call the police and arrest him (plaintiff).

231. This was too much for plaintiff to bear.

232. Plaintiff was completely devastated, shaking and wrecked emotionally and all he said to Maurice and Daniele was: *"I have the right to be here as long as I want and whenever I*

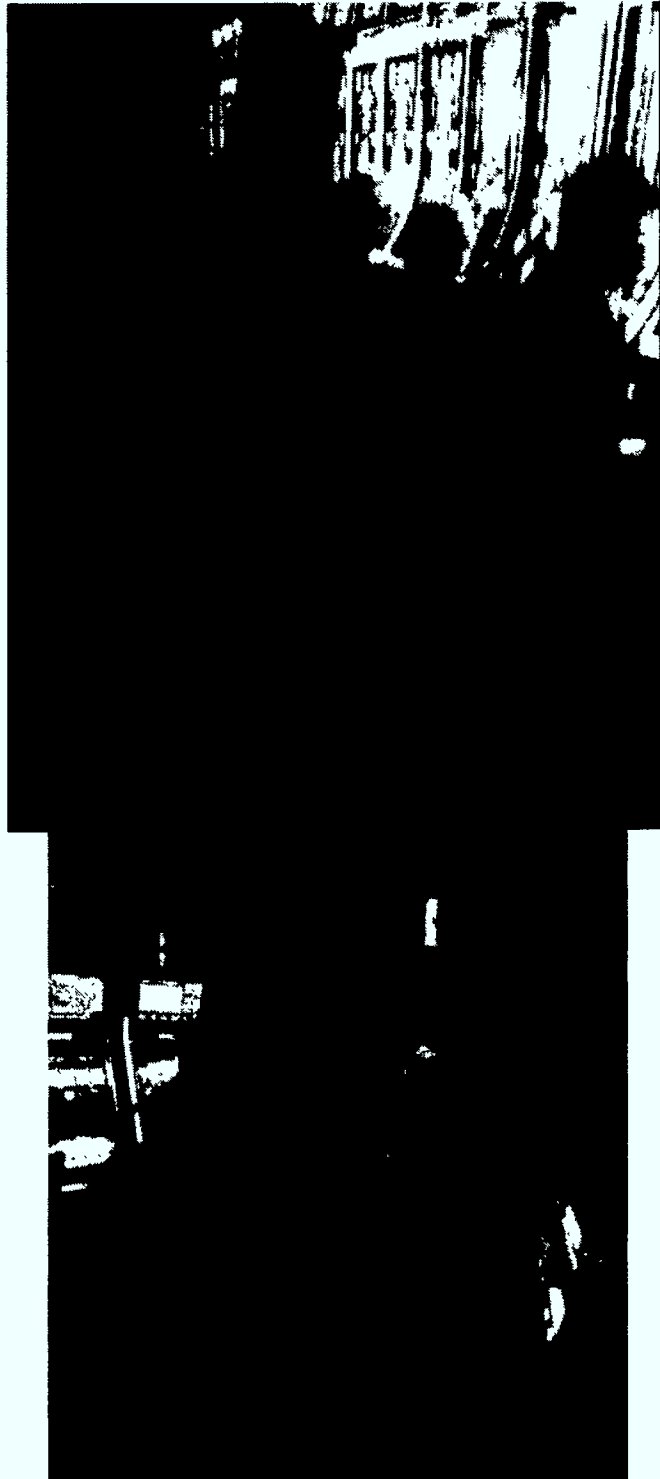
want and I have given these evils so much money for them to dare kick me out for nothing I have done”.

233. Plaintiff was afraid if he took pictures they would come and take his phone and break it, but he had no other option to prove that he was being discriminated and started to take pictures of every person he saw in the casino watching others play.













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Count 30

234. While plaintiff was taking pictures of guests not playing and watching others play totally unbothered and undisturbed by these defendants who kicked plaintiff out of casino for not being actively playing a moment, a different security officer came to plaintiff and told plaintiff he can't take pictures in the casino, while people do this every single day in the casino and no one ever has been told not to take pictures, as, they were now telling plaintiff.

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Count 31

235. This new security guard, interfering with plaintiff, because plaintiff was using his camera in this place of accommodation, while people everywhere were using the cameras undisturbed, looked into plaintiff's phone as if he wanted to take his phone away and plaintiff put his phone in his pocket as the only way to stop him from taking the phone from his hand.

236. The security officer was ok with plaintiff putting his camera in his pocket and he walked away.

237. Plaintiff then walked straight to the Malcolm the first security officer who kicked him out earlier, and approached Malcolm in the area between the Asian Restaurant and the Security Desk, between the slot machines and the gaming tables.

238. Plaintiff told Malcolm that he spends thousands of dollars here every night and that he did not appreciate them harassing and intimidating and threatening him for nothing he had done, accusing him for something he had done (overshadowing) and for something everyone was doing in this casino with no trouble from them.

239. Plaintiff told Malcolm to tell them, whoever had ordered him to act this way and kick him out that he (plaintiff) had taken pictures of everyone around not playing and simply

watching others, and told Malcolm to see them everywhere, to realize that he was not going to let this heinous and despicable discrimination based on foreign origin go away.

240. Plaintiff pointed out to Malcolm that everywhere people were watching others play undisturbed, but Malcolm ignored this, saying he does what he is told to do, not caring that plaintiff was forced out for something others had no problem doing in this casino.

241. Plaintiff had no option left but warn Malcolm before Malcolm called for others to come kick him out, but warn Malcolm saying: *"I will not let this go, and I have all the pictures to straighten this in a court of law and you don't need to call anyone to kick me out because I am leaving now"*.

242. Malcolm said nothing while making sure plaintiff was leaving staring at plaintiff as plaintiff started to walk out of the casino.

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Count 32

243. On Sunday July 29th plaintiff and his friend J. Lee had been playing all night the same Progressive Blazing Sevens they play every time.

244. Both plaintiff and Lee had been like usual losing all night.

245. Around noon time, Silvia, and American born gusset of this casino was playing machine no. 13. 18. 03.

246. Sylvia told plaintiff she wanted to put that machine on hold for a couple of hours, but she was not a black card member.

247. Sylvia asked plaintiff if plaintiff could jump in her machine play a couple of dollars and reserve the machine for her, as they, American Born Gusts did, all the time, for each other.

248. Plaintiff told Sylvia, "You already know they don't let me even cup for myself and take my card with them to check how much I have played and they tell me you have not played enough and tell me enough is something they decide not letting me know what enough is.

249. Sylvia knew this but Sylvia did not care at this moment, what they did to plaintiff and how they treated plaintiff she wanted her machine to be reserved, and wanted plaintiff to try it anyway.

250. Sylvia said to plaintiff; *"Just say you don't want to help" they will not dare do this again to you, they never ask us how much we have play and check our cards behind their walls, that was stupid they did to you. You want to help or not"*.

251. Plaintiff tried to reason with Sylvia that he does not dare even to put a cup on machines he been playing because cannot handle their humiliation and harassment, and that he would have helped her in a heartbeat if he was American born and treated like all of them.

252. This is racist Sylvia told plaintiff, implying plaintiff was making some racist assumptions.

253. Of course, plaintiff and you know how far it is, if i am playing and use my own card, they will not let me and will take my card to check it behind the walls and no matter if i have been playing a week straight and putting 20thosuand dollars in this machine they still come and say was not enough, but

254. I tell you what if I give you my card and you tell them you want to stop any machine not even with your card but mine, as long as you don't look American born this mf filthy racist cowards, will block the machine for you with no question asked.

255. Sylvia laughed and took plaintiff's card to try it out.

256. Sylvia did not even call a slot attendant but called one of the managers on the floor, that day (*Sunday July 29, 2018*) in her machine (*Machine No: 13. 18. 03*) and told the manager to block that machine for her handing her plaintiff's card and, even more,

257. Sylvia told the manager she was using Sami's card (*Sami is plaintiff's Albanian native name*) and all his friends in the live casino know him by Sami.

258. Sylvia told the manager that Sami is cupping ping it for me and to plaintiff's shock and bewilderment, they would allow the American born (Sylvia) block her machine even with plaintiff's card with no question asked, as long as the beneficiary of this privilege was an American born, while they would not permit do the same even though it was his own card and they took that machine out of service for her (Sylvia).

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Count 33

259. On Saturday, August 18, 2018 plaintiff went to casino around noon.

260. Plaintiff played all day and all night mostly in the slot machine 13.18. 04 and lost on that machine about \$2400

261. Around midnight or 1 AM, Monday August 19th plaintiff decided to change machines and went to play progressive sun moon machines, at the end of the east-west side of the casino.

262. He lost there, another 8-900 dollars.

263. sometime between 5 to 8 am on Sunday august 19th plaintiff returned back to his blazing seven machine (machine No.13. 18 04, where he had lost about \$2400.00.

264. Plaintiff saw a slot attendant (a young black man) that had opened the door of that machine and was making some notes on notebook that they keep inside the machine.

265. That notebook, that defendants cannot destroy, reveals exactly what plaintiffs alleges with no further prove needed at court, as same as all the video recordings.

266. Plaintiff assumed the machine was out paper (roll of tickets they print out).

267. Plaintiff decided to play that machine in hopes of getting back some of the 24hundered dollars he had lost in that machine, assuming there were not many people to have played that machine when he was playing sun and moon.

268. Plaintiff asked the attendant if the machine would be ready to play soon

269. The attendant replied: *"I can't reveal that information to you"*.

270. Plaintiff asked what did he mean, asking again if it would take a minute or an hour or all day long because he had been playing for like 24 hours and needed to know if he could resist to wait to play or not, since he had spent a lot of money before in that machine.

271. The sot attendant said: *"I can't tell u that"*

272. Thought, to plaintiff it sounded rude and impolite not giving plaintiff any idea when the machine would be available to play, plaintiff accepted the fact, that attendant had been directed not to put the machine back in service and moved on the other side of those 5 machines, and started to play next to a black lady.

273. Plaintiff started to play now machine No. 13-18-01 while the black lady was between plaintiff and the attendant, in the machine in the machine 13. 18. 04

274. The attendant was still doing something to the door-opened machine.

275. The black lady told plaintiff that the (the attendant) was putting the machine on hold, for a Chinese or a Korean player who had lost a lot of money in that machine and wanted and was driving home to get more money.

276. Plaintiff told the black lady "*Ah ok, I understand but he could have told me that*" and continued to play, but,

277. While the attendant was closing the door and putting the machine out of service, a white American lady with her husband or a friend of hers (they come together early in the mornings) told the attendant they wanted to play that machine he was putting out of service.

278. The attendant, to plaintiff's and the black lady's surprise, as soon as these americing born white couple, expressed interest to play that put the machine, allegedly held for an Asian player, who had rushed home to get more money, relaying on these despicable defendants to acts in good faith and reserve the machine for him, till he return, made it ready for them to play, something they would not do for plaintiff, exploiting the Asian guy for another foreign born (plaintiff).

III.

Facts evidencing exploitation of plaintiff, for the benefit and interest of their American born guests

Count 34

279. Plaintiff witnessed that morning, August 19th, that even when defendants extended the same rights privileges offered to all but denied the foreign born guests, to foreign born players like the Asian gentleman who fled home to bring more money in hopes of getting back some of the money he had lost, based on the 98% money back advertisement;

290. Defendants, still used this to exploit even more the foreign born for the benefit and interest of the American born guests, because,

281. The Asian player left to get more money, in hopes that he will defendants would hold his machine out of service in good faith for him to try and get back a portion of what he had spend, as the machine was suppose to pay as part of the 98% but

Count 35

182. Demonstrating their business practice routine and habit to abuse discriminate and exploit foreign born guests, for the benefit and interest of the American born players, defendants opened the machine they had supposedly reserved, in good faith for the Asian gentleman and that they had refused to plaintiff and

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Count 36

283. As soon as this white American born couple sat down the machine, that had been cold all day for plaintiff and for the Asian guy, got hot as if touched by a magic wand, and started to hit red sevens after red sevens because, once the white couple inserted on it their membership card and

284. The white American born, in less than 15 minutes with less than 100 bill inserted on that machine, got around 800 - 900 dollars, and the electronically stored information, that these defendants cannot dare destroy will prove this in the court.

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Count 37

285. Once the white amercing born couple got close to a thousand dollars, that was in 10-15 minutes with about 100 dollars invested having hit 3-4 they quit and;

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Count 38

286. With the most heinous and despicable acts of exploiting some groups of people for the benefit and the interest of others, these defendants (the slot attendant) come to put that machine, back out of service, to hold for the Asian guy who hey had robbed as gangsters and thugs, in bad faith, behind his back, proving routine and habit.

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Count 39

287. Defendants left the machine flushing (*they flash when out of service*) in order to deceive and defraud the Asian player that they the machine had been kept out of service for him, to mock and abuse and extort from him another 3-4 thousand dollars, that these evil cowards do it purposefully exploiting the fact that the addicted players will get more desperate and loose more money, tricked to do so by the heinous coward acts of these despicable entities.

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Count 40

288. On Monday. August 20, 2018 Plaintiff received an offer to stay for free at the live loft hotel that these defendants.

289. That e mail was send to plaintiff by defendant less than 24 hours earlier, at 10 AM August 18, 2019.

290. That offer was automatically generated and addressed to all their members who held a black or a higher-ranking card membership offering a free 3 days stay at live lofts or a reduced price for those three days at live hotel who is part of the casino.

291 The days were exactly that Monday and till Wednesday.

292. Plaintiff called the defendants the same day, on Monday August 20th to reserve his three nights as a privilege offered to him and to all like guests who held a black card.

292 Plaintiff called to make the reservation at around 5PM

294. When plaintiff called the person answering the phone said they needed his membership card.

295. Once they checked plaintiff's information and learned who plaintiff is they said to plaintiff: "Sorry we do not have rooms for this card number" meaning for this person (plaintiff).

296. Defendants did not say this to plaintiff when he called but only after they verified which of the embers he was clearly continuing with their habit and routine to discriminate against one or some groups for the benefit of some other groups and for the interest and benefit of pleasing some selected players at the expense of others.

for example, we do not have any more rooms or all rooms were sold out, they exactly asked can we have your membership Id?

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Count 41

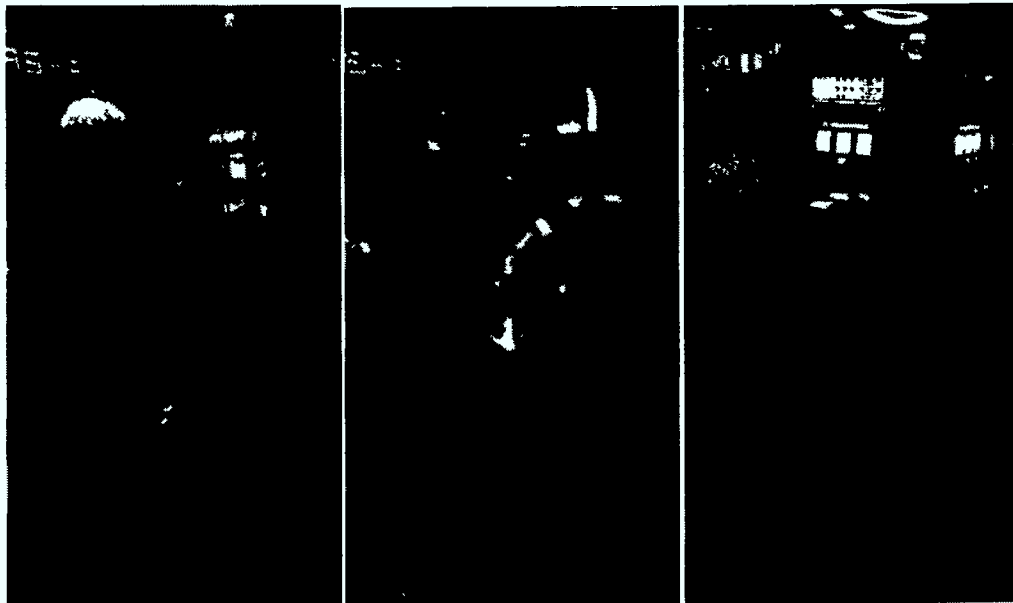
297. On Wednesday Dec 19, 2018 while plaintiff and Corinne Green (*below is pictures of both Plaintiff and Green*) were playing a black American born looking and sounding was playing next to them on two machines at once; 04 and 03.



298. At around 11: 30 she called a slot attendant to put a cup on both machines.

299. The attendant, disabled both the machines for her with no question asked.

and reserved for the player shown in the incorporated picture bellow



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Count 42

300. On Friday December 21, 2018 plaintiff and J. Lee were playing together and Lee was holding one machine she had been playing to come back to it if they hit in the other machine.

301. As it easy, can be proven through electronically stored information, 3-4 slot attendants came and told Lee she is not allowed to do this.

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Count 43

302. On Thursday, Jan. 3 2019 a white American woman turned the chair and leaned it against one of these blazing Seven machines and placed her cloths on the chair, to tell everyone she was holding them tat machine for herself to play it later on and held it with no problem from these defendants from 6-7 PM till around 11 PM.

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Count 44

303. On Sunday Feb 17, 2019 defendants were organizing an event called "RED ENVELOPE GIVE AWAY" where all black card and/ or higher-ranking card members were invited to participate for a chance to win up to \$188,000.00 dollars and where every participant would be a winner.



304. Everyone interested was on line and plaintiff as black card holder got online as well.

305. Defendants had people in front selecting who is and who is not qualified though and

306. Defendants took plaintiffs card (they said nothing) went to check it and came back to tell plaintiff he does not qualify and to get out of the line.

307. Plaintiff asked to know why he as a black card holder was not qualified and asked to know the criteria to qualify.

308. The slot attendant got annoyed and impatient and told him "you don't qualify" leaving it up to plaintiff to be kicked out by their security or leave the line.

309. Though it is clear that this was an unlawful act if the members of the certain ranking card were still buying the chance to two participate rather than pure luck, plaintiff found their heinous tactics to arbitrary decide who qualifies or not and their refusal to disclose the criteria requirements, as despicable tools to abuse and exploit certain groups of people for the benefit and the interest of the other groups by these 2 defendants.

IV.

Facts evidencing False Arrest & Malicious Prosecution against plaintiff for the benefit and the interest of the American Born Guests.

Count 45

311. On Friday October 18, 2019 at around 7:50 PM plaintiff was breaking a few hundred-dollar bills into 20-dollar bills using 2 Voucher Cashing/ ATM machines, next to the high limit table entrance that is on the left of the security desk.



312. Plaintiff was using both the machines while one was processing the task he would insert the money on the other one.

313. While Plaintiff was, taking the money from the left ATM he noticed a young balk woman who looked amercing approaching the right machine.

314. Plaintiff extended his hand to get the money from the right machine to let the American born guest use the right machine.

315. While plaintiff reached for his money, she turned and said to plaintiff: "is this your money?"

316. Plaintiff told her it was his money and grabbed his money.

317. The American born looking guests got closer to plaintiff in a threatening manner telling plaintiff to give that money to her because, she said that money is not his.

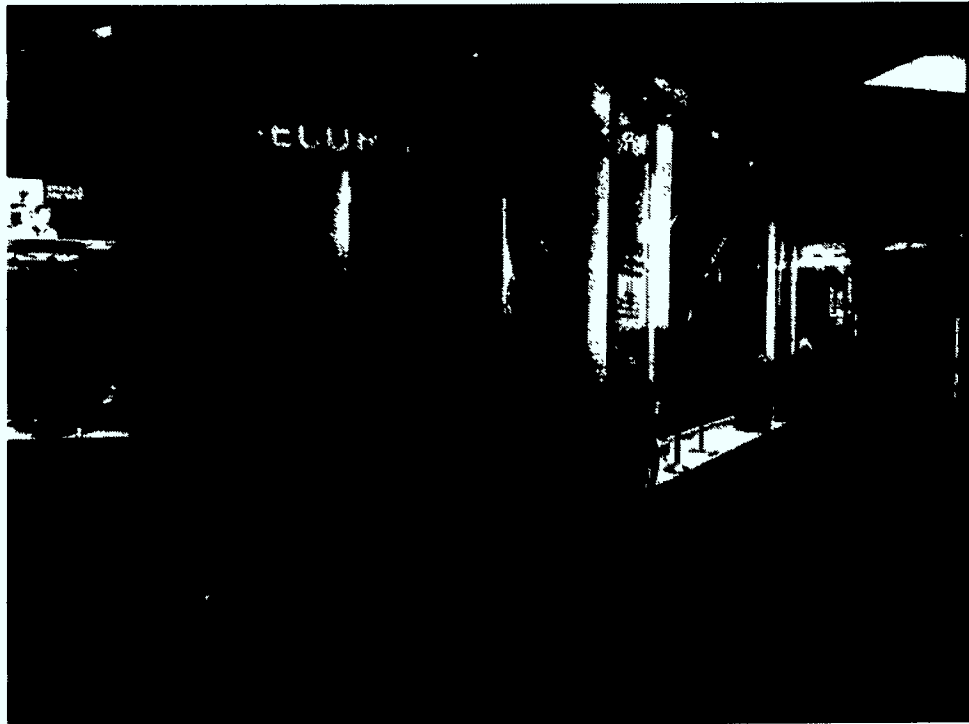
318. Plaintiff thought she was jacking while she became more aggressive and persistent and threatening demanding his money.

319. Plaintiff was looking for help and everyone was now staring what was going on and yet no one came to help, though if it was plaintiff instigating the fight and disturbance, they would have jumped in second over plaintiff. (Again, the preserved (stored) electrical information that defendants would not dare destroy, will prove this to the court.

320. The American born looking guests got bolder that no one was stopping her from the security of this casino and because plaintiff was trying to avoid confrontation at all cost, and was trying to walk in either direction, before attracting more bad attention that embarrassed and frightened him immensely.

321. Plaintiff was left to handle this on his own when the security people owed him some minimum protection but were denying it, and seeing her not stop but get closer in his face, plaintiff finally turned angry at her and said: *"Are u stupid u idiot I thought you were joking, leave me alone Ok"*

322 Plaintiff looked again for help but no help was coming to resolve this situation and she was not giving up demanding his money, though the security desk was next to where all was happening, something this casino would not have done if plaintiff was the one attacking and trying to rob an American born guest of this place of accommodation.





323. Plaintiff did not know how to escape this situation before being hit or being scratched by this American born woman for which plaintiff could do nothing because he considers fighting or hitting a woman the lowest of the lowest act of a man and yet:

324. Quarreling, fighting or being hit or slapped by a woman was just as same degrading harassing and embarrassing to him. with no help by any one.

325. Plaintiff noticed that a few meters against the wall were the restrooms and he thought the only place he could go where she could not chase him, having no other protection at that moment was to head to the restrooms.

326. Plaintiff started to proceed toward the but she was following him the same aggressively asking for the money, with plaintiff being perceived, at least in the plaintiff's mind, as a thief.

327. Plaintiff saw every one playing tables and slot machines staring and yet not of the casino employees bothered to warn the security guards to come help though they should have done that themselves, as they do in second, if an American born guests was the potential victim.

328. The American born guest got in front of plaintiff took her phone and brought it to plaintiff's face taking pictures of plaintiff.

329. Plaintiff was now panicked and terrified that a boyfriend or a pimp of hers, thinking the worst of her, at that moment, or friend she might have come with, would jump on him and beat the hell out of him, and yet no one from casino was coming to help.

330. Plaintiff was trying not to lose his composure and was trying to slide through her and into the men's restrooms', the only place he could find some sanctuary in this place of accommodation, as a foreign-born guest, where no one was offering protection, he needed and as if they wanted plaintiff to react and find some excuses and pretexts to falsely accuse and prosecute him.

331. Plaintiff was able to reach the restrooms and he was able to enter the restrooms and she did not follow him inside.

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Count 46

332. When plaintiff came out, she was not there and plaintiff decided to go to the security desk to ask them why they refused or neglected to help him, in this traumatic situation he had in this place of accommodation, when they owe him some sense of security and had to provide it to him, even if they did not give a damn for him as a non-American born guest.

333. When plaintiff approached the security desk the young American black lady was there talking to him and the security officer, ordered plaintiff to stop there and not move and not say a thing to him.

334. Plaintiff tried to tell security officer what the storey was but he refused to listen to plaintiff while being nice and respectful to the other guest who was an American born while plaintiff is not.

335. Plaintiff now sow other people and his friends playing blazing sevens with him staring what had plaintiff done to be treated and arrested like that.

336. The security did not permit plaintiff to go, waiting for some other people to come to help him handle plaintiff while talking nice and respectfully to the American born thief and thug.

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Count 47

337. Plaintiff did not like the attention from the casino and neither the falls arrest and asked if he could give the security desk his driver license and his membership card ID and go play his machines till, they were ready to talk to him about the incident, to avoid the harassment and the attention.

338. The security guard told plaintiff: "You cannot go nowhere".

339. Plaintiff was very angry, and felt very humiliated and threatened and harassed by these acts and told the security officer that what they were doing to him was not right'

340. The officer did not care.

341. Plaintiff insisted that they had no reason to detain him, and that he was the one who needed their help that they denied and that now they were acting with him exactly as she was acting with him.

342. Plaintiff asked the officer, who was ignoring plaintiff and not let plaintiff move, what would be the consequences if the camera recording proved that they had failed or refused to help him and that they had falsely arrested and detained him.

343. The security guard again did not care what plaintiff asked and continued to talk to the American born guests, telling plaintiff, as cameras recording will prove to the court, to keep the distance from them but not dare move, or go away.

344. Plaintiff could not easily accept this heinous and despicable discriminatory treatment and this false detention and told the officer that; "if after reviewing the cameras is seen that plaintiff did anything wrong or stole took her money, as they were accusing him you call the police and take me to jail but;

345. Plaintiff said to the officer that if the camera proves that he was the victim when they failed and refused to help and that they were treating him, as criminal, with no prove that he had done anything to be treated that way, simply because he looked and sounded foreign born while she did not, then they would have a much bigger problem with him in a court of law, and that he was fed up with their coward and despicable discriminatory acts against him for the interest and the benefit of the American born guests.

346. Plaintiff decided to shut his mouth since he was getting nothing with his complaints and requests while they were threatening the thief and the thug with outmost respect, simply because she was American born and he was not.

Count 48

347. Some minutes alter that to plaintiff seemed like years of embarrassment intimidation he did not deserve; another security guy came to the desk who claimed to be the head security in this place of accommodation.

348. The head of the security was a gentleman called Gregory Chevis.

349. Security Chevis ordered plaintiff to follow him to the ATM machine and the American born guests followed them.

345. She was insisting that plaintiff stole her money and they were treating plaintiff as he had stolen his money and they did not care to hear plaintiff's version of the story.

346. Security Chevis just as he other security, continued to chart with great patience and respect with the American born gust while keeping plaintiff at their arms length as the person not worthy of respect.

347. This despicable continued discriminatory treatment hurt plaintiff immensely and terrified plaintiff that they were planning to call the police on him, on false pretenses, therefore:

348. Plaintiff spoke now to the head security, Chevis that if the camera prove he stole her money and not the other way around they should take him to jail right away but,

349. Plaintiff warned him, be prepared that if camera proves otherwise around, he did not care if they would send her to jail or not, he was going to take them to court for this.

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Count 49

350. The head security, Chevis ignored plaintiff and did not give a damn what plaintiff said again talking with respect with the black America born lady while waiting for someone who was running the videos to tell him who had robbed or try to rob whom, though as long as they were concerned it did not matter since they were treating him as the thief and her as the great person who had been victimized by him by simply judging that he was non American born while she was.

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Count 50

351 In the end the head security, Chevis turned to the American born thief and thug and bully guest and told her, we can't do anything to him because, the videos shows was his money.

352. This was alarming to plaintiff and tormenting to the core that instead of arresting her in the spot, and apologizing to plaintiff for all they had done, to him, they just told her: "We are sorry we can't rob this foreign fuk..er for you because the recording does not allow us" by saying is nothing we can do because it looks it was his money.

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Count 51

353. While these defendants had detained plaintiff under their speculative racist presumption on the wrong they did nothing to the American born guest except apologies to her that they could not help her and take plaintiff's money and give it to her and take his ass to jail because the video recording prevented them.

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Count 52

354. Plaintiff became furious about what was again happening and asked for the security officer's name and the officer gave plaintiff his business card.



355. The Security Guard handed plaintiff the card telling plaintiff to get away; as if "Go fu..ck yourself" with no apology for what they had done to him and with no respect.

356. The Head of Security told the thief and the thug who was an American born sorry for not being able to help her and told her to go have fun while turning to plaintiff and threatened plaintiff that if plaintiff is seen anywhere close to where she platy they will take his ass to jail, that shocked and terrified plaintiff. not only because of this discriminatory immoral and heinous treatment but because he had not to be extra cautious now where he play not knowing that the thief and the thug might be playing behind to give these despicable defendants excuses and pretext to kick him out or prosecute him under false pretenses.

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Count 53

357. Plaintiff was not at ease with what had happened to him and a few minutes later he saw, standing at the security desk a different gentleman, a big white young guy.

358. Plaintiff approached him and asked him who was the big boss amongst them.

359. The security guy asked plaintiff why and plaintiff explained to him what had happened.

360. The security guy said to plaintiff that what had happened does not look right and

361. The security guy said that they (his colleagues) should have apologies to plaintiff and not to the lady trying to rob him.

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Count 54

362. The security guy told plaintiff that he would call people above him and that he would come and get him at his slot machine

363. Plaintiff told the security guy that he was going to play to the blazing sevens that were not far from the security desk.

364. The security guy did not contact plaintiff making it clear to plaintiff that this for them was normal discriminatory practice.

V.

Facts evidencing Retaliation against plaintiff as reaction to Plaintiff's warning of a Legal Actions.

Count 55

365. On Sunday April, 17, 2021 at around 3:00 AM after I loosing again, as usual, all his money and after having witnessed, as usual, in this casino, foreign born looking or sounding

players loose big and quick while others was not doing fantastic either but were at least, like always, lasting much longer, winning and losing, like in any other casino, plaintiff was fed up and decided he should ban himself for good from this place of accommodation.

366. Plaintiff asked one of the casino employees if she knew how one can ban himself.

367. The employee directed plaintiff to the security desk.

368. Plaintiff asked the Security personal to help him ban himself.

369. The Security officer called some people and;

370. The Security officer order plaintiff to follow him.

371. Plaintiff was paraded through the people plying slot machines from the Security desk next to the cashier's booth, through the entire casino floor to a door that is next to the bathrooms, in the far end of the south west side of the casino where the walls split the casino gaming floor from the parking garage.

372. Plaintiff had been a loyal guest of this place for years and spend for them more than 1.5 million dollars to be treated with some kind of dignity from them, even now when he was asking to be banned.

373. Instead, he was escorted, as a thief or someone who had done something wrong, in that place and was being kicked out.

374. For a man who had played here for so many years and who had donated here so much money, he believed some kind of thanks and gratitude and even his host to come and say goodbye and thank him for having been a loyal customer of theirs and not escort him, like a criminal and to an exit door that that was clear an act of retaliation, by thugs and criminals who once they have sucked all your money, will through you out of the boat.

375. Plaintiff had expected, they would take him to his host, on their offices next to the high limit table games, shackle hands and tell him that he cannot comeback if he was banned but not this way of humiliation and disgrace.

376. While escorted toward that way, plaintiff felt as if a restaurant owner was kicking you with his stuff from the kitchen back door just because you decided not to dine in that restaurant any more.

377. The security officer and another person opened a door, where it appeared only some casino employee could get through and there was a hallway that appeared more, like a jail where arrested criminals are being processed, after having committed a crime.

378. For five people came to plaintiff, and the video recording that they cannot dare destroy, pursuant to the laws of ESI, but make available at trial) that they tried to scare and disparage plaintiff from banning himself, at all cost.

379. They told plaintiff to think well of this move because he would face severe consequences, in the future, for doing this, that plaintiff took this will be disclosed in his personal information and would harm his future as if a terrible bad thing.

380. They told plaintiff that if he banned himself, he would be arrested as soon as he came close to this place, if he ever changed his mind.

381. They gave him some papers to sign yet were not letting him sign because they supposedly wanted to make sure he was not drunk or into drugs, something they had not asked him when he was playing their machines.

382. Plaintiff repeated to them many times that he does not during and does not do drugs to get over with the paper work.

383. The security officer was making threatening postures standing behind his shoulders, to build fear and tension and to disparage plaintiff from banning himself.

384. Plaintiff asked them that they did not ask him before he started to play his machines if he was drunk or in drugs, to make an intelligent decision to play or not as they were asking him now, and they became angry and impatient, while doing everything from preventing him to sign those papers.

385. They were trying to escalate this decision of plaintiff to ban himself into a conflict and plaintiff had to explain to them that he was doing this for himself and was not trying to be rude or disrespectful to any of them.

386. Plaintiff wanted to calm them down and not create a unnecessary conflict with him for asking to be banned, and told them; "I understand you have a job to do and are doing your job but i want to ban myself, for them to allow him sign the papers with no retaliation from them for doing that.

387. They started again to discourage plaintiff not to sign, stating, as the record speaks for itself, that the papers do not stop him and that he should stop himself without signing those papers.

388. They insisted to discourage plaintiff from banning himself, stating that if he stopped himself without signing those banning papers he would not be arrested, if he ever changed his mind.

389. Plaintiff explained to them that he will drive to other casinos and he had made up his mind to be banned from this particular place of accommodation.

390. They told plaintiff that he would never be allowed to step foot in any casino if he banned himself from this place

391. Plaintiff signed the papers and told them i want to have the fear of being arrested to deter me from ever coming near place.

392. They insisted that he go home and take the papers with him, and read them at home and return them another day if he still had not changed his mind.

393. Plaintiff insisted that they let him ban himself and told them that: *"I want to prevent myself from ever coming here you are telling me, as if telling a drug addict, just come and try these drugs once more and then decide"*.

394. They were getting more hostile and plaintiff understood they were trying to instigate a mental distress and crises for him to say or do something that would give them the pretext t o kick him out instead of him banning himself.

395. Plaintiff was forced do as they were forcing him, terrified by their hostility and threats in this secluded area, under the garage and far from any other witness, that could be of help, in any improvised, escalation of the events, and agreed to take the papers home to read them and bring them back another day, if he had not changed his mind.

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Count 56

396. After plaintiff made this decision and took the appears with him, the told plaintiff that if he was taking the appears to ban himself with him, he could not walk out the same door he had come but had to leave from a back door.

397. Plaintiff knew too many people in this casino having been a regular nightly guest of this place for many years and could not accept such disgrace and humiliation just because he was deciding to stop playing, more for the fact that he cared a lot what others might be saying why was he kicked from the back door.

398. They told plaintiff if he knew how to go find the car in the 5th floor because they would not permit him use the elevator and that he had to get out and walk and find the car, if he was banning himself.

399. Plaintiff said i have come from the amen door and i deserve to leave from the main door and only if I enter your place after being banned you can do this to me but now and not tonight, I have not done nothing for you to treat me this way.

400. They said we can't permit because we want to make sure you don't play.

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Count 57

401. Plaintiff believed he did not deserve this treatment and plaintiff believed they owed him some respect, not to kick him out like a stray dog from the back door.

402. Plaintiff had done nothing wrong, like fighting or stealing or cursing at people, or breaking anything to be kicked out of back door and walk from the ground floor to the faith floor to find his care being prevented from using the elevator even to the parking garage.

403. Plaintiff told them he deserves some respect and that he wanted to go say goodbye to his friends; Almira, Isaac, Angie and Anita who were still playing and who had offered him some money to play earlier when he told them that he was banning himself.

404. They told plaintiff, since he was not yet banned, he could even go play.

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Count 58

405. After the casino had reopened following the closure due to corona pandemic by 2021 plaintiff had started to play *Fire Link Slot* machine and only occasionally, he played the *Seven Blazing Sevens*.

406. Sometime around Middle of July 2021, plaintiff was playing one of the Fire Link Machines, next to the Blazing Seven Machines that was having problems for day printing tickets.

407. Almost every time someone tried to print the ticket, the machine would stop making a strange characteristic notice, that was bothersome to other players and would not stop till a slot attendant arrive, to open it and fix the problem.

408. When a machine experiences these kinds of malfunctions, (having trouble accepting cash or printing tickets), it starts flashing, and making a very loud and annoying noise till a slot attendant arrives to correct the problem.

409. When the slot attendant comes the attendant first opens the machine to inspect what the problem is and if the attendant can fix it the attendant fixes it and if the problem is more difficult than the attendant can handle the attendant calls one of the technicians, they are distinct because the slot attendant dress in black and yellow while the technician dress in black in this casino.

410. If the technician too cannot fix it after the technician arrives if the slot attendant calls a technician, then the technician puts the machine out of service, pending repairs.

411. Most of the time machines act this way when they are either full of money, or out of printing papers and or when there is a paper jam, that slot attendant can detect only after they open the machine secured door.

412. There are a few of such machines in the casino but plaintiff played mostly the one next to the Blazing Seven Machines.

413. There is a row of about 14-16 of fire link machines next to the Blazing Seven Machines, placed back-to-back in a single raw.

414. This machine that was having this kind of problem, getting stuck, every time you wanted to print the ticket was in the middle of the row facing west, toward the smoking section of the casino.

415. Plaintiff was playing that machine till late that night, with no people playing next to him, casino had almost gotten empty, that late at night.

416. Plaintiff was losing a lot of money and he could not stop playing it believing that when the machine had sucked a lot of money and was time to hit and if it hit it ought to pay back a good chunk of the money, he had lost, since it had been cold for so long.

417. Of course, like any other player in this situation, plaintiff was thinking that the defendants were controlling the machine, and had no incentive to pay him, sine there was no one they could trick to play.

418. Nonetheless, having a believe that machines have to pay back a personage they have been fed with plaintiff was fighting against the odds, hoping they will in the end pay him something not because of their good heart but because this is the law.

419. And finally in the end, after so many exhausting hours, and after so much money in, the machine hit and plaintiff thought he would get back some money.

420. The machine paid nothing compared to what he had invested, and plaintiff was sure in himself, it was because he was the only one playing, and they had no hard time to monitor him and still all his money since he was betting big, and he slammed the spin button harder unhappy with the operators of this casino.

421. Plaintiff decided to stop playing because he was sure they would not let him play and he, had realized he only had a chance to win if the machines were crowded and if he did not

stay long in am ama machine to give them (defendants) time to pinpoint him and change the payout rate.

422. If the casino was empty and he being foreign and appearing foreign born, like his Philippine and Latino friend he had no chance of winning in this casino.

423. He had been in this casino a non-stop guest for years day and night to have witnessed that only American born guests had the same odds to win or loose irrespective if the casino was empty or full.

424. Plaintiff decided to print the ticket and leave to come and play the rest of the money the next day and only when the casino was full, if he could manage to full the operators of this casino who (he was sure by now) played with the machines based on who was playing them.

425. When plaintiff pressed the cash out button, the machine started like many times before flashing and making the noise it makes when the machine cannot print.

426. Though there were no many players in the casino floor the attendant were taking forever, and plaintiff assumed there was no reason for that, except to make him get angrier, to provoke something, as they had done with him since he had informed them, he was bringing a law suit, or plaintiff assumed to make him start playing another machine till they arrive.

427. Plaintiff decided to play another machine till the attendant arrives.

428. When the attendant finally came the attendant did not open the machine door and did not print his ticket but was talking to someone.

429. Plaintiff asked why wasn't the attendant fixing the machine and print him the ticket.

430. The attendant said because they (*meaning his supervisor*) are trying to see if plaintiff had broken the machine.

431. This was stupendous beyond believe, to plaintiff, because the machine had been having this problem for days, and the machine had no sing of being broken or damaged, usually a screen cracked or buttons damaged, and they had not even touched the machine yet to open the door to inspect the problem.

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Count 59

432. The defendants did not allow the slot attendant to touch the machine to open the machine door to see what was preventing the machine from printing the ticket something never happened before for as long as plaintiff had been playing in this casino.

433. Every single time it is the attendant who determines what is wrong after opening the machine and not someone outside the casino floor with the attended not allowed to even tough yet the machine.

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Count 60

434. The defendants did not allow the slot attendant to open the machine and the attended left without helping plaintiff who was waiting to print the ticket from the malfunctioning machine.

435. Plaintiff was sure they attendant would come back after whatever they tried to cook behind his back and open the machine and print him the ticket and waited for it, while playing another machine.

436. Some minute later a technician came to the machine but he too was not doing anything to print the ticket or inspect the machine, listening to defendants who were directing him what to do and not the other way around.

437. Plaintiff asked the technician why wasn't he printing his voucher or inspecting what was wrong with the machine.

438. The technician said because they're trying to find out if you have broken the machine.

439. Plaintiff said: "*You think the machine is broken?*"

440. The technician said I did not say the machine is broken; they are trying to determine that.

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Count 61

441. The technician was finally told to print the ticket and plaintiff left.

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Count 62

442. On Tuesday, July 20, 2021, at around 10:00 PM, two casino employees, one appearing to be a manager of some kind and the other a security personal in civilian clothes approached plaintiff in a very threatening and intimidating, and disrespectful manner, in front of other people while plaintiff was waiting for a machine between the blazing sevens, roulette slot machines, next to the cahiers.

443. One of them asked plaintiff: "Are you are William Whittman?".

444. Plaintiff thought they were there to give plaintiff a ward of some kind, (the personal hosts approach people in this casino, in yet another act evidencing they monitor your every move).

445. They told plaintiff you have to pay us a \$1300.00 dollars restitution.

446. This threatening and intimidating thug like approach did not convince plaintiff they were serious and he thought this was a stupid joke that he did not find that amusing or funny but he thought it was a joke nonetheless.

447. Plaintiff was trying to figure out if he understood them if they were joking or threatening him but seeing them stare at plaintiff with contempt, plaintiff said:

448. "I owe you money?".

449. They said: "Yes you owe us \$13,000.00. Are you going to pay or not? We can call the police if you want it paid the hard way.

450. Plaintiff was shocked more than the way they had approached him for threatening him now with the police for something plaintiff had no clue, what they were talking about.

451. They did not let plaintiff move, telling plaintiff he cannot go anywhere till he pay.

452. Plaintiff looked at the people around witnessing this and said to them; "*You're threatening me?*".

453. They said: "*Yes we are threatening you because you boke the machine I broke your machine*".

454. Plaintiff responded to them: "*No sir I have not broken no machine of yours you have broken me*".

455. The manager said to plaintiff: "*You either pay or you can't stay here*".

456. Plaintiff said: "I can't be here?", and with without waiting their answer wanting no escalation turned to depart and leave this place for good.

457. The manager did not like this and told plaintiff; *"Where do you think you are going?"* preventing plaintiff from leaving.

458. Plaintiff said to him: *"Didn't you just tell me I can't stay here if I don't pay?"*

459. The manager said: *"Yes, you can't stay if you don't pay, but you can't leave like that we will escort you out and make sure you are going straight out and do not attempt to play".*

460. Plaintiff said: *"You don't need to escort me I know the door where I came from".*

461. The manager said: *"No, the security will escort you, and where is your car parked?"*

462. Plaintiff asked him; *"Why do you need to know where I have parked?"*

463. The manager said: *"So we can escort you to the car".*

464. Plaintiff said to the manager: *"You want me now to control me and command my acts even outside the casino"*

465. The Security guy escorted plaintiff out, and on the way-out plaintiff encounter his friend Almira, who asked surprised that plaintiff was being escorted out:

466. *"Sami what happened"*

467. Plaintiff answered Almira; *"They kicking me out".*

468. Almira asked plaintiff; *"Kicking you out for what"*

469. They say I broke the fire link machine, that has problem printing the tickets"

470. Almira said; They Know damn well you have not broken that machine, that machine ahs had problem for weeks" and the security officer continued to escort plaintiff out for one thing and one thing only retaliate against him because plaintiff was suing them and they knew it and do this before he files the lawsuit.

THEREFORE plaintiff prays that the court assigns plaintiff the *Service of the Attorney General*, pursuant to §2000a-5 (a). and provide for the relief as asked in 10 of this Complaint.

William Whitman